

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

Case No.: 18-23538 (RDD)  
(Jointly Administered)

SEARS HOLDINGS CORPORATION, et al.

Debtors.

Chapter 11

**MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE**

I, Michael A. Shakouri, request admission, ***pro hac vice***, before the Honorable Robert D. Drain, to represent Niagara Realty LLC in the above-referenced case.

***I certify that I am a member in good standing*** of the bar of the State of California licensed to practice before all courts of the State of California. I am also a member in good standing of the Bars of the United States District Courts for the Central District of California, Southern District of California.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: October 18, 2018

By: /s/ Michael A. Shakouri  
Michael A. Shakouri (SBN 131347)  
Goodkin & Lynch LLP  
1800 Century Park East  
10<sup>th</sup> Floor  
Los Angeles, CA 90067  
Tel: (310) 552-3322  
Fax: (310) 943-1589  
Email: [mshakouri@goodkinlynch.com](mailto:mshakouri@goodkinlynch.com)